

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

ANGEL THERESE TENNISON

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

JULIE ANN ALVIN FOR MENTAL ILLNESS  
RECOVERY CENTER (MIRC)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

**Complaint for Violation of Civil Rights**  
(Non-Prisoner Complaint)

Case No. 3:21-cv-00039-MGL-SVH  
(to be filled in by the Clerk's Office)

Jury Trial:  Yes  No  
(check one)

**NOTICE**

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed *in forma pauperis*.

**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>ANGEL SHEREE TENNYSON</u>
Street Address	<u>1212 METZLE ROAD APT 29 H</u>
City and County	<u>COLUMBIA RICHLAND</u>
State and Zip Code	<u>SOUTH CAROLINA 29210</u>
Telephone Number	<u>737-781-8066</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>JULIE ANN ALVIN for MIRC INC</u>
Job or Title (if known)	<u>PRESIDENT</u>
Street Address	<u>1408 GREGG STREET</u>
City and County	<u>COLUMBIA RICHLAND</u>
State and Zip Code	<u>SOUTH CAROLINA 29201</u>
Telephone Number	<u>803-786-1844</u>

Defendant No. 2

Name	_____
Job or Title (if known)	_____
Street Address	_____
City and County	_____
State and Zip Code	_____
Telephone Number	_____

Defendant No. 3

Name	_____
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Job or Title \_\_\_\_\_  
 (if known) \_\_\_\_\_

Street Address \_\_\_\_\_  
 City and County \_\_\_\_\_  
 State and Zip Code \_\_\_\_\_  
 Telephone Number \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_  
 Job or Title \_\_\_\_\_  
 (if known) \_\_\_\_\_

Street Address \_\_\_\_\_  
 City and County \_\_\_\_\_  
 State and Zip Code \_\_\_\_\_  
 Telephone Number \_\_\_\_\_

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

- Federal question       Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Title 16 and Title 8 of The Civil Rights Act of 1964  
Title 24 Housing & URBAN DEVELOPMENT

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**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) \_\_\_\_\_, is a citizen of  
the State of (name) \_\_\_\_\_.

b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated  
under the laws of the State of (name) \_\_\_\_\_,  
and has its principal place of business in the State of (name)  
\_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of  
the State of (name) \_\_\_\_\_. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is  
incorporated under the laws of the State of (name)  
\_\_\_\_\_, and has its principal place of  
business in the State of (name) \_\_\_\_\_. Or is  
incorporated under the laws of (foreign nation)  
\_\_\_\_\_, and has its principal place of  
business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

IN THE UNITED STATES DISTRCIT  
FOR THE DISTRICT OF SOUTH CAROLINA

CASE #3:21-CV-00039-MGL-SVH

BETWEEN

ANGEL SHEREE' TENNYSON

PLANTIFF(S),

AND

v.

JULIE ANN ALVIN FOR MIRCI INC

DEFENDANT(S)

**STATEMENT OF CLAIM**

1. WE WERE DENIED THE BENEFIT OF ENJOYING A PLACE TO DWELL AND WE ENDURED VIOLATION(S)TO OUR RIGHTS AS AFRICAN AMERICAN/ DISABLED FAMILY WHEN IT CAME TO MIRCI INC FOLLOWING THROUGH WITH REPAIRS/ACCOMODATIONS. WHILE IN THE HOMELESS TRANSITION PROGRAM. WE WERE DISCRIMINATED AGAINST BASED ON RACE AND DISABILITY AFTER AN OLDER CAUCASIAN WOMAN IN THE PROGRAM PUT THEM ON THE NEWS, SHE WAS IMMEDIATELY ASSISTED BUT WE WERE NOT.
2. MIRCI FAILED TO MAKE REASONABLE ACCOMADATIONS TO THE UNIT FROM MAY 29, 2018 UNTIL OCTOBER 8, 2019.
  - a. REPLACE LOCK AND INSTALL SOUND BELL GIVEN FOR AUTISTIC MINOR SO HE WOULD NOT RUN OUT THE DOOR
  - b. FIX FLOORING THROUGHOUT THE HOME SO IT WOULD BE LIVEABLE, WE WOULDN'T FALL THROUGH, AND SO NAILS WOULD NOT CUT ANYONE WALKING THROUGH THE HOME
  - c. MIRCI FAILED TO MAKE REPAIRS TO THE AC IN CHILDS ROOM WHICH EXACERBATED HIS DISABILITY
3. MIRCI INC MADE AN UNINHABITABLE ENVIRONMENT FURTHER INTOLERABLE WHEN THEY STARTED THE HARASSMENT AND

RETALIATION TATICS AFTER CALLING DCSS FILING A FALSE REPORT  
WHICH IS A VOLIATION IN ACCORDANCE TO PENAL CODE 1172 AND (SC)  
SECTION 63-7-430

4. DUE TO ACCOMMODATIONS NOT BEING MET AND AN UNLIVEABLE ENVIRONMENT WE WERE FORCED OUT TO FIND ADEQUATE LIVING TO SUIT OUR NEEDS. THE MORE WE COMPLAIN THE MORE MIRCI CAME AGAINST.US. MIRCI DID NOT ACCOMMODATE US WITH FINDING A UNIT THAT WAS LIVEABLE NOR DID THEY ASSIST US WITH HOTEL ACCOMADATION UNTIL MODIFICATIONS WERE MADE. OR OTHER PERMANENT HOUSING WAS FOUND

**PARTICULARS OF VIOLATIONS**

- a) TITLE VI AND VIII OF THE CIVIL RIGHTS ACT OF 1964
- b) VIOLATED CODES UNDER SOUTH CAROLINA CHILDRENS CODE  
SECTION 63-7-430 AND 63-7-440
- c) THE SOUTH CAROLINA FAIR HOUSING LAW MAKES IT ILLEGAL TO  
DISCRIMINATE IN HOUSING BECAUSE OF RACE, COLOR, RELIGION,  
SEX, NATIONAL ORIGIN, PHYSICAL OR MENTAL HANDICAPS, OR  
FAMILIAL STATUS (FAMILIES WITH CHILDREN).
- d) VIOLATION OF TITLE 24 OF THE HOUSING AND URBAN  
DEVELOPMENT CODES AS FOLLOWED: SUBCHAPTER A §100.7  
LIABILITY FOR DISCRIMINATORY HOUSING PRACTICES, SUBPART D  
§100.2 —PROHIBITION AGAINST DISCRIMINATION BECAUSE OF  
HANDICAP, AND SUBPART F—INTERFERENCE, COERCION OR  
INTIMIDATION

**PRAYER FOR RELIEF**

- a) ENTER JUDGEMENT DECLARING MENTAL ILLNESS RECOVERY CENTER (MIRCI) INC LIABLE FOR ALL LOSSES WHICH INCLUDES BUT NOT LIMITED TO FINANCIAL LOSS (FINDING TEMPORARY HOUSING AND MOVING COST), DAMAGES FOR DISCRIMINATION, HARASSMENT, AND RETALIATION WHICH WERE INDURED.
- b) ENTER A JUDGMENT FOR AMOUNT SOUGHT OF \$175000
- c) REIMBURSEMENT FOR COURT FEES AND COST
- d) FURTHER RELIEF AS THE COURT MAY DEEM JUST AND PROPER

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

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**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

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**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

PRAYER FOR RELIEF IS \$175,000 WHICH INCLUDES PUNITIVE DAMAGES FOR HARASSMENT, DISCRIMINATION, RETALIATION, TEMPORARY MOVING EXPENSES \$9500, COURT FEES, AND ANY OTHER RELIEF THE COURT MAY DEEM FAIR.

**V. Certification and Closing**

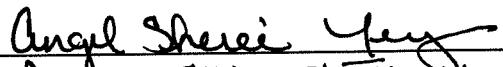
Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Feb 7, 2021

Signature of Plaintiff



Printed Name of Plaintiff

ANGEL SHREE' TENNYSON

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20 \_\_\_\_.

Signature of Attorney

\_\_\_\_\_

Printed Name of Attorney

\_\_\_\_\_

Bar Number

\_\_\_\_\_

Name of Law Firm

\_\_\_\_\_

Address

\_\_\_\_\_

Telephone Number

\_\_\_\_\_

E-mail Address

\_\_\_\_\_